Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of

Amendment of Section 73.202(b).
Table of Allotments,
FM Broadcast Stations.
(Lewisville, Gainesville, Robinson,
Corsicana, Jacksboro, and
Mineral Wells, Texas)

MM Docket No. 97-91 RM-8854

To: Chief, Allocations Branch

COMMENTS OF GRAHAM NEWSPAPERS, INC.

Graham Newspapers, Inc., licensee of Station KWKQ(FM), Graham, Texas, by its attorneys and pursuant to Section 1.420 of the Commission's rules, hereby submits its Comments in response to the Notice of Proposed Rule Making and Order to Show Cause (DA 97-489) released in the above-captioned rulemaking proceeding on March 14, 1997. In support thereof, the following is shown:

Graham Newspapers, Inc. recently acquired Station KWKQ(FM) and has been exploring possible upgrades to the facility. At present, Station KWKQ operates a Class A facility on Channel 296 (107.1 mhz). The channel is allotted as a Class C3 channel. As shown in the attached Engineering Statement of Sellmeyer Engineering, substitution of Channel 237A at Jacksboro, Texas, would allow Station KWKQ(FM) to upgrade its facilities to Class C2 at a reference point located 16 kilometers north northeast of its present site as illustrated by Exhibit E1-1, a spacing study showing the relevant allotments at a special reference point. Exhibit E1-2 is a section of the NOAA tactical navigation chart TPC G-20-D showing the area in which an FM station operating on Channel 296 may be located if Channel 299 is deleted from Jacksboro.

Graham Newspapers, Inc. is aware that the deadline for the submission of counterproposals in this proceeding was yesterday, and that Section 1.420(d) of the Commission's rules provides that counterproposals will not be considered if they are advanced in reply comments. However, in light of the Commission's mandate under Section 307(b) of the Communications Act to provide a fair, efficient, and equitable distribution of radio service, Graham

VLDC01-172798.1

No. of Copies rec'd List A B C D E Newspapers, Inc. respectfully requests that the Commission substitute Channel 237A at Jacksboro, and on its own motion, amend the Table of Allotments with respect to Graham, Texas, as follows:

PRESENT

PROPOSED

296C3

* * *

296C2

As shown in the Engineering Statement, the special reference point for the allotment is:

> N.L.: 35° 15′ 11" W.L.: 98° 30' 33"

Moreover, there is a wide area in which the proposed Channel 296C2 facility could be located, all of which is on relatively high ground.

WHEREFORE, for the foregoing reasons, Graham Newspapers, Inc. respectfully requests that the Commission substitute Channel 237A for Channel 299A at Jacksboro, Texas, and on its own motion, substitute Channel 296C2 for Channel 296C3 at Graham, Texas.

Respectfully submitted,

GRAHAM NEWSPAPERS, INC.

By:

Erwin G. Krasnow

Verner, Liipfert, Bernhard, McPherson & Hand, Chartered 901 15th Street, N.W. Suite 700

Washington, D.C. 20005

Its Attorneys

May 6, 1997

BROADCAST AND COMMUNICATIONS CONSULTING ENGINEERS
P.O. Box 355 McKinney, Texas 75070
MEMBER AFCCE
(872) 542-2086

ENGINEERING STATEMENT IN SUPPORT OF COMMENTS OF GRAHAM NEWSPAPERS, INC. MM DOCKET 97-91 RM-8854 MAY, 1997

This Firm has been retained by Graham Newspapers, Inc., licensee of Radio Station KWKQ, Graham, Texas to prepare this Engineering Statement in support of its comments in the matter of Mass Media Docket 97-91. Docket 97-91 proposes to amend the FM Table of Allotments in Section 73.202(b) of the Rules with respect to assignments at the communities of Lewisville, Gainesville, Robinson, Corsicana, Jacksboro and Mineral Wells, Texas.

Graham Newspapers, Inc. supports the request of Heftel Broadcasting Corporation in the proposed changes to the Table of Allotments. Graham Newspapers, Inc.'s Station KWKQ would be directly affected by this proposal through the proposed deletion of Channel 299A and substitution of Channel 237A at Jacksboro, Texas.

Graham Newspapers, Inc. recently acquired Radio Station KWKQ and has been exploring possible upgrades to the facility. At present Station KWKQ operates a Class A facility on Channel 296 (107.1). The channel is allotted as a Class C3 channel. Substitution of Channel 237A at Jacksboro would allow Station KWKQ to upgrade its facilities to Class C2 at a reference point located 16 kilometers north northeast of its present site as illustrated by Exhibit E1-1, a spacing atudy showing the relevant allotments at a Special Reference Point. Exhibit E1-2 is a section of the NOAA tactical navigation chart TPC G-20-D showing the area in which an FM station operating on Channel 296 may be located if Channel 299 is deleted from Jacksboro.

Graham Newspapers, Inc. respectfully requests that the Commission, on its own motion, add the community of Graham, Texas to the pending MM Docket 97-91 and that the Table of Allotments be amended with respect to Graham, Texas as follows:

PRESENT

PROPOSED

296C3

296C2

The Special Reference Point for the allotment is:

N.L.: 35° 15′ 11″ W.L.: 98° 30′ 33"

There is a wide area in which the proposed Channel 296C2 facility could be located, all of which is on relative high ground.

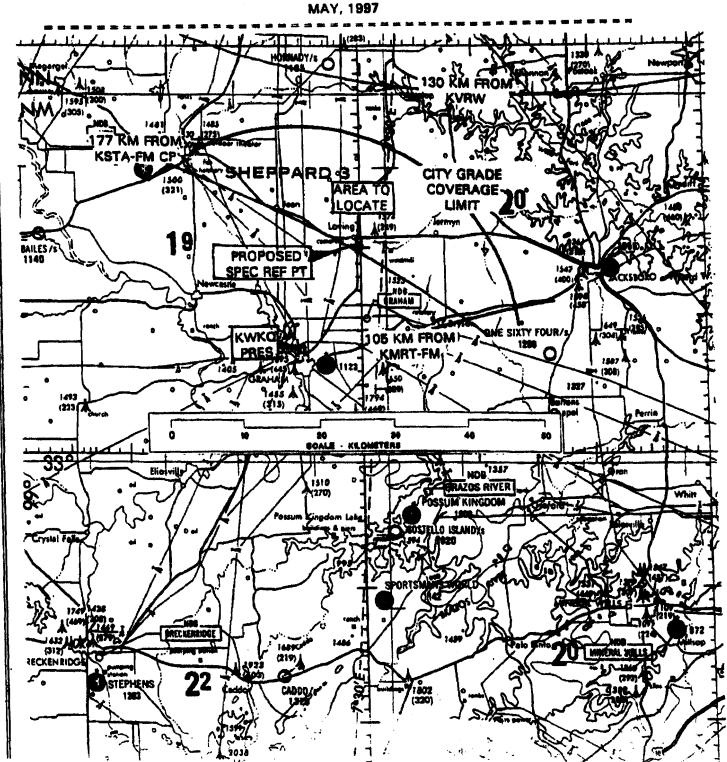
BROADCAST AND COMMUNICATIONS CONSULTING ENGINEERS
RO. Box 856 McKinney, Texas 75070
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(972) 542-3056

EXHIBIT E1-1 FM SPACING STUDY FOR CLASS C-2 OPERATION SPECIAL REFERENCE POINT GRAHAM NEWSPAPERS, INC. RADIO STATION KWKQ GRAHAM, TEXAS MAY, 1897

FM \$tud Locatio Call Statue	y for: KWKQ /SPEC RE n: GRAHAM, TX City, State Proponent	F PT FCC Database Channel Cl Chan Class Freq kW File Number HAAT	Date: 4/97 lass: C2 Latitude Dist. Longitude Azm.	33-15-11 96-30-33 Required Clear (km)
		Charmet 296 107.1 ml		
ALLOC	GRAHAM, TX	296 C3 107.1	33-07-37 16.0	177
VAC	Use of 73.	296 C3 107.1 Docket-89-280 0 215 for short spacing	98-35-35,209.2 requires: 166	-161.0 SHORT -150.0 SHORT
KWKQ	GRAHAM. TX	296 A 107.1 3.00	33-07-37 16.0	166
LIC	KSWA, INC.	296 A 107.1 3.00 BLH-6776 30	98-35-35 209.2	-150.0 SHORT
	Use of 73.	215 for short specing	requires: 143	-127.0 SHORT
ALLOC	JACKSBORO. TX	299 A 107.7	33-14-14 32.4	55
DEL	HEFTEL BROADCASTING	299 A 107.7 C Docket-97-91 0	98-09-43 93.0	-22.6 SHORT
	Use of 73.	215 for short spacing	requires: 53	-20.6 SHORT
ALLOC	JACKSBORO, TX	299 A 107.7 Docket-96-10 0	33-14-14 32.4	55
VAC	•	Docket-96-10 0	98-09-43 93.0	-22.6 SHORT
	Use of 73.	.215 for short specing	requires: 53	-20.6 SWORT
ALLOC	COLEMAN, TX	296 C3 107.1	31-51-16 177.42	177
USE	·	- 0	99-25-36 209.3	+0.42 CLOSE
KSTAFN	COLEMAN, TX	296 C3 107.1 25. DC 8PH-960416ID 65	31-51-16 177.42	177
CP	COLEMAN COUNTY SROAM	DC 8PH-960416ID 65	99-25-36 209.3	+0.42 CLOSE
KSTAFM	COLEMAN, TX	296 A 107.1 3.00 DC BLM-6495 55	31-51-16 177.4	166
LIC	COLEMAN COUNTY BROA	DC BLH-6495 59	99-25-36 209.3	+11.4 CLOSE
KMRTFM	GRANBURY, TX	294 C 106.7 100.	32-15-07 119.2	105
LIC	KCYT-FM LICENSE COR	294 G 106.7 100. PO BLH-900125KC 302	2 98-02-48 158.5	+14.2 CLOSE
ALLOC	GRANBURY, TX	294 C 106.7 Docket-79-178	32-14-35 121.2	105
USE	•	Docket-79-178	98-00-55 157.4	+16.2 CLEAR
KVRW	LANTON, OK	297 C2 107.3 50 8LH-920313KC 150	. 34-36-27 151.8	130
LIC	ARTHUR PATRICK	BLH-920313KC 15	0 98-16-26 8.2	+21.8 CLEA

BROADCAST AND COMMUNICATIONS CONSULTING ENGINEERS
P.O. Box 356 McKinney, Texas 75070
MEMBER APCCE
(972) 548-2006

EXHIBIT E1-2 MAP SHOWING AREA TO LOCATE CHANNEL 296C-2 GRAHAM, TEXAS



BROADCAST AND COMMUNICATIONS CONSULTING ENGINEERS
P.O. Box 358 McKinney, Texas 75070
MEMBER AFCCE
(972) 642-2056

CERTIFICATION OF ENGINEER

I hereby state that:

I am President of Sellmeyer Engineering

The Firm of Sellmeyer Engineering has been retained by Graham Newspapers, Inc. to prepare this Engineering Exhibit

I am a graduate of Arizona State University with the degree of Bachelor of Science in Engineering

I am a Registered Professional Engineer in the States of Ohio and Texas

My qualifications as an Engineer are a matter of record with the Federal Communications Commission, having been previously accepted in applications of this type

This Engineering Exhibit was prepared by me personally or under my direct supervision, and

All facts stated herein are true and correct to the best of my knowledge and belief.

J.S. Selimeyer, P. E.

May 5, 1997

P. O. Box 356 McKinney, Texas 75070 972-542-2056



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CERTIFICATE OF SERVICE

I, Laurel M. Akhund, hereby certify that I have, on this 6th day of May, 1997, send by first-class mail, postage prepared, copies of the foregoing "Comments of Graham Newspapers, Inc." to the following:

* Robert Hayne, Esq.
Mass Media Bureau, Room 8337
Federal Communications Commission
2025 M Street, N.W.
Washington, D.C. 20554

Lawrence N. Cohn, Esq. Cohn & Marks 1333 New Hampshire Avenue, N.W. Suite 600 Washington, D.C. 20036-1573

Counsel for Heftel Broadcasting Corporation

Laurel M. Akhund

^{*} By Hand